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Subject: Arkema Preliminary EE/CA Data
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All,

The unvalidated Arkema EE/CA sediment data included 15 sediment samples for PCB aroclors which were all ND. This finding appears to be inconsistent with the RI total PCB figures. There are a number of potential reasons for this. For example:

- Unvalidated Arkema data are not correct (i.e., false negatives).
- Previous aroclor detections may be false positives due to interferences
- Previous aroclor detections are spatially separate from the EE/CA sample locations
- *High total PCBs are based on PCB congener data which is not consistent with the aroclor data.* DEQ has discussed this model with EPA in the past and the potential for the chloralkali waste waters to have a non aroclor PCB component.

The conceptual model for the presence and distribution of PCBs in sediment adjacent to Arkema is undefined. Since sediment adjacent to Arkema has elevated DDX, dioxins/furans and PCBs it is important to define (if possible) the model for the PCB distribution in sediment. As the EPA team reviews the EE/CA data, refinement of the PCB sediment model should be part of this evaluation.

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